

Court of Common Pleas of Philadelphia

County Trial Division

Civil Cover Sheet

For Office of Judicial Records Use Only (Docket Number)

| | | | |
|--|------------|--|--|
| PLAINTIFF'S NAME JACKIE PEEPLES | | DEFENDANT'S NAME PORFOLIO RECOVERY ASSOCIATES, LLC., | |
| PLAINTIFF'S ADDRESS 8019 Mansfield Ave PHILADELPHIA, PA 19120 | | DEFENDANT'S ADDRESS 310 East Drinker Street PO BOX 175, Dunmor, PA 18512 | |
| PLAINTIFF'S NAME | | DEFENDANT'S NAME | |
| PLAINTIFF'S ADDRESS | | DEFENDANT'S ADDRESS | |
| PLAINTIFF'S NAME | | DEFENDANT'S NAME | |
| PLAINTIFF'S ADDRESS | | DEFENDANT'S ADDRESS | |
| TOTAL NUMBER OF PLAINTIFFS 1 | | TOTAL NO. OF DEFENDANTS 1 | |
| COMMITMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons | | <input type="checkbox"/> Petition Action <input type="checkbox"/> Transfer From Other Jurisdiction <input type="checkbox"/> Notice of Appeal | |
| AMOUNT IN CONTROVERSY <input checked="" type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00 | | COURT PROGRAMS <input type="checkbox"/> Arbitration <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Non-Jury <input type="checkbox"/> Other: _____ <input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Commerce (Completion of Addendum Required) <input type="checkbox"/> Settlement <input type="checkbox"/> Minor <input type="checkbox"/> W/D/Survival | |
| CASE TYPE AND CODE (SEE INSTRUCTIONS) | | | |
| STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS) | | | |
| RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) | | IS CASE SUBJECT TO COORDINATION ORDER? | |
| | | Yes <input type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | |
| TO THE OFFICE OF JUDICIAL RECORDS: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: Papers may be served at the address set forth below. | | | |
| NAME OF PLAINTIFF/PETITIONER/APPELLANT'S ATTORNEY | | ADDRESS (SEE INSTRUCTIONS) | |
| PHONE NUMBER | FAX NUMBER | | |
| SUPREME COURT IDENTIFICATION NO. | | E-MAIL ADDRESS | |
| SIGNATURE | | DATE | |

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JACKIE PEEPLES, ,

Plaintiff,

v.

**PORTFOLIO RECOVERY
ASSOCIATES, LLC.,**

A collection agency in the US

Defendants.

Case No.: _____

**PLAINTIFF'S COMPLAINT
FOR A CIVIL CASE ALLEGING
NEGLIGENCE**

PARTIES TO THIS COMPLAINT

1. The Plaintiff **JACKIE PEEPLES**, (“King”), *in pro se*, is, and at all times material hereto was, a competent adult, a natural person, a citizen of the State of Pennsylvania, and currently located at 8019 Mansfield Ave., PHILADELPHIA, PA 19120.
2. The Defendant **PORTFOLIO RECOVERY ASSOCIATE, LLC.**, is an American chain of beauty store duly incorporated under the laws of the State of VIRGINIA and has its principal place of business in the state of Pennsylvania, 310 East Drinker Street PO BOX 175, Dunmor, PA 18512

JURISDICTION

3. Pursuant to 28 U.S.C. § 1331, Plaintiff brings forth this action before the Eastern District Court of Pennsylvania, to seek relief and is entitled to claim the damages as a result of the acts committed by the Defendant exhibiting negligence prejudicial to the

rights of Plaintiff pursuant to the provisions of the existing Federal Laws, such as but not limited to; Fair Credit Reporting Act, Title 15 of the U.S.C.

VENUE

4. Venue is appropriate pursuant to 28 U.S.C. § 1339 for reasons that the events herein alleged give rise to the claims within the jurisdiction; in addition, the Defendant has its principal place of business in the State of Pennsylvania under its registered agent Domestic Limited Liability Company at 310 East Drinker Street PO BOX 175, Dunmor, PA 18512. Thus, the Eastern District Court of Pennsylvania, is the proper venue for this case.
5. Furthermore, the amount in controversy that the Plaintiff claims that the Defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court.

BRIEF SUMMARY OF CLAIMS

6. Plaintiff, a consumer, have sent a dispute letter on or about 2021 to Defendants, a consumer reporting agency, which disputed the incompleteness and/or accuracy of a tradeline by Portfolio Recovery Associates, LLC, – account # COMEN-8097608284****;
7. The Defendant herein failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances; herein enumerated are the acts constituting negligence; to wit; (1) Defendant as an agency failed to update financial and credit reports; (2) failed to maintain the proper standards of giving credit report; (3) provided an inaccurate financial and credit information; (4) and committed actions, errors and poorly maintained files amounting to serious negligence in violation of federal

laws, especially under “FCRA”; (5) where such failure as a result affected Plaintiff that he was unable to acquire favorable funding, having denied due to inaccurate credit file and information which caused or likely to have caused substantial injury.

STATEMENT OF FACTS

(Allegations Common to All Causes of Action)

COUNT ONE: Misreporting Amounting to Negligence

8. Plaintiff repeats the allegations above.
9. Defendant failed to perform and do everything in its power to accurately gather, and report consumer information pursuant to the provisions of the Federal Credit Reporting Act or “FCRA”.
10. Defendant inaccurately reporting the payment history of Plaintiff’s account.
11. If Defendant had exercised proper care or had taken action that a reasonable person would with regard to credit information, Plaintiff would have not suffered damages as a result.

COUNT TWO: Misuse, Misrepresentation and Unfair Practices

12. Plaintiff repeats the allegations above.
13. Defendant **PORFOLIO RECOVERY ASSOCIATES, LLC** failed to maintain its responsibilities and uphold the standards stipulated under *Section 5 (a) of the Federal Trade Commission Act* or “FTCA” amounting to unfair practices and omissions that misleads or is likely to mislead the consumer herein Plaintiff.
14. Defendant’s actions exhibited negligence in conjunction with consumer compliance examinations, and other related supervisory activities including a risk-focused consumer

compliance supervision program in assessing credit information and providing reports of such.

COUNT THREE:

Deprivation of Fairness and Right to Consumer Information

15. Plaintiff repeats the allegations above.
16. Defendant failed to follow proper procedures and reported inaccurate information.
17. Pursuant to the Fair Credit Reporting Act in relation to 15 U.S.C § 45 which provides for the basic guidelines that all persons and entities engaged in commerce, including banks and credit reporting agencies is mandated to follow measures in engaging acts or practices that best service consumers' interests.

COUNT FOUR: Violation of Legal Standards in Commerce

Amounting to Deceptive Practices

18. Plaintiff repeats the allegations above.
19. Pursuant to the regulatory requirements under Title 12 § 228.28(c) "CFR" or the Community Reinvestment Act in relation to Section 5 of the FTCA, the acts and practices of Defendant **PORFOLIO RECOVERY ASSOCIATES, LLC**, amounts to deceptive acts for violating both regulatory and statutory requirements that adversely affects consumer rights.
20. Although each violation may appear isolated, the lack of exercise of the duty of care in willful negligence of providing inaccurate credit information constitute an illegal

practice. Here, Defendant with utter disregard of procedural protocols and its duties as a credit reporting agency should likewise be held liable.

COUNT FIVE: Right to Multiple Damages

21. Plaintiff repeats the allegations above.
22. Pursuant to the provisions of the FRCA in relation to FTCA and U.S.C, Plaintiff is entitled to multiple damages, notwithstanding, any other relief available from other federal laws violated, thus allowing Plaintiff to claim from each.
23. As proximate cause of Defendant's actions and negligence, the Plaintiff suffered damages for having been denied the opportunity to acquire funding due to inaccurate information.
24. As provided in the provisions of the Federal Credit Reporting Act, Plaintiff is entitled to claim the following damages;
 - a) Actual damages for the harm caused by Defendant's action or failure to act by the agency, business or individual, which is no limit to how high an award can be, but Plaintiff herein claims in equivalent to the funding lost
 - b) Statutory damages for express violations of the regulatory and statutory requirements imposed, amounting to \$110,000.
 - c) Punitive damages as to punish Defendant as an agency, business or individual to further deter from violating the FCRA again amounting to \$150,000.
 - d) Legal fees and consequential damages that arise here from.

PRAYER

WHEREFORE, Plaintiff prays unto this honorable Court, to grant the following:

1. Award the Plaintiff the above-mentioned counts of damages;
2. and grant Plaintiff any relief that the Court may deem just and proper.

DATED: November 12, 2022

Respectfully Submitted By:

/S/ JACKIE PEEPLES
Address: 8019 Mansfield Ave
PHILADELPHIA, PA 19120

Pro se

CERTIFICATION OF CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Dated: November 12, 2022.

/S/ JACKIE PEEPLES

Address: 8019 Mansfield Ave
PHILADELPHIA, PA 19120

Tel#:

Pro se

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

| | |
|--|---|
| <p>I. (a) PLAINTIFFS</p> <p>(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i> _____</p> | <p>DEFENDANTS</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i> _____</p> |
|--|---|

| <p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <div style="display: flex; justify-content: space-between;"> <div style="width:48%;"> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> </div> <div style="width:48%;"> <p><input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p> </div> </div> | <p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <th></th><th style="text-align: center;">PTF</th><th style="text-align: center;">DEF</th><th></th><th style="text-align: center;">PTF</th><th style="text-align: center;">DEF</th></tr> <tr> <td>Citizen of This State</td><td style="text-align: center;"><input type="checkbox"/> 1</td><td style="text-align: center;"><input type="checkbox"/> 1</td><td>Incorporated or Principal Place of Business In This State</td><td style="text-align: center;"><input type="checkbox"/> 4</td><td style="text-align: center;"><input type="checkbox"/> 4</td></tr> <tr> <td>Citizen of Another State</td><td style="text-align: center;"><input type="checkbox"/> 2</td><td style="text-align: center;"><input type="checkbox"/> 2</td><td>Incorporated and Principal Place of Business In Another State</td><td style="text-align: center;"><input type="checkbox"/> 5</td><td style="text-align: center;"><input type="checkbox"/> 5</td></tr> <tr> <td>Citizen or Subject of a Foreign Country</td><td style="text-align: center;"><input type="checkbox"/> 3</td><td style="text-align: center;"><input type="checkbox"/> 3</td><td>Foreign Nation</td><td style="text-align: center;"><input type="checkbox"/> 6</td><td style="text-align: center;"><input type="checkbox"/> 6</td></tr> </table> | | PTF | DEF | | PTF | DEF | Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
|--|--|----------------------------|---|----------------------------|----------------------------|-----|-----|-----------------------|----------------------------|----------------------------|---|----------------------------|----------------------------|--------------------------|----------------------------|----------------------------|---|----------------------------|----------------------------|---|----------------------------|----------------------------|----------------|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF | | | | | | | | | | | | | | | | | | | | |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | | | | | | | | | | | | | | | | | | | | |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | | | | | | | | | | | | | | | | | | | | |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 | | | | | | | | | | | | | | | | | | | | |

| IV. NATURE OF SUIT <i>(Place an "X" in One Box Only)</i> | | | Click here for: Nature of Suit Code Descriptions. | | |
|---|--|--|---|---|---|
| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES | |
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | <p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <p>LABOR</p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <p>IMMIGRATION</p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p>INTELLECTUAL PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <p>SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY | CIVIL RIGHTS | PRISONER PETITIONS | | | |
| <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | <p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p>Other:</p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

V. ORIGIN *(Place an "X" in One Box Only)*

☐ 1 Original Proceeding

☐ 2 Removed from State Court

☐ 3 Remanded from Appellate Court

☐ 4 Reinstated or Reopened

☐ 5 Transferred from Another District *(specify)* _____

☐ 6 Multidistrict Litigation - Transfer

☐ 8 Multidistrict Litigation - Direct File

| | |
|-----------------------------------|---|
| <p>VI. CAUSE OF ACTION</p> | <p>Cite the U.S. Civil Statute under which you are filing <i>(Do not cite jurisdictional statutes unless diversity):</i></p> <p>Brief description of cause:</p> |
|-----------------------------------|---|

| | |
|--|--|
| <p>VII. REQUESTED IN COMPLAINT:</p> | <p><input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.</p> <p>DEMAND \$ _____</p> <p>CHECK YES only if demanded in complaint: JURY DEMAND: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> |
|--|--|

VIII. RELATED CASE(S) IF ANY *(See instructions):*

JUDGE _____

DOCKET NUMBER _____

DATE _____ SIGNATURE OF ATTORNEY OF RECORD _____

FOR OFFICE USE ONLY

| | | | | |
|-----------------|--------------|--------------------|-------------|------------------|
| RECEIPT # _____ | AMOUNT _____ | APPLYING IFP _____ | JUDGE _____ | MAG. JUDGE _____ |
|-----------------|--------------|--------------------|-------------|------------------|

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

U.S. Department of Justice
United States Marshals Service

PROCESS RECEIPT AND RETURN

See: *"Instructions for Service of Process by U.S. Marshal"*

| | |
|-----------------------------|-------------------|
| PLAINTIFF JACKIE PEEPLES | COURT CASE NUMBER |
| DEFENDANT | TYPE OF PROCESS |

**SERVE
AT**

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
PORTFOLIO RECOVERY ASSOCIATES, LLC.,

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)

310 East Drinker Street PO BOX 175, Dunmor, PA 18512

| | | |
|--|---|---|
| SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW | Number of process to be served with this Form 285 | 1 |
| JACKIE PEEPLES 8019 Mansfield Ave PHILADELPHIA, PA 19120 | Number of parties to be served in this case | 1 |
| | Check for service on U.S.A. | |

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

| | | | |
|---|---|------------------|--------------------|
| Signature of Attorney other Originator requesting service on behalf of: | <input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT | TELEPHONE NUMBER | DATE 11/12/2022 |
|---|---|------------------|--------------------|

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE

| | | | | | |
|---|---------------|---------------------------|--------------------------|--|------|
| I acknowledge receipt for the total number of process indicated. (Sign only for USM 285 if more than one USM 285 is submitted) | Total Process | District of Origin No. | District to Serve No. | Signature of Authorized USMS Deputy or Clerk | Date |
|---|---------------|---------------------------|--------------------------|--|------|

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

| | | |
|--|------|---|
| Name and title of individual served (if not shown above) | Date | Time <input type="checkbox"/> am <input type="checkbox"/> pm |
|--|------|---|

| | |
|--|-------------------------------------|
| Address (complete only different than shown above) | Signature of U.S. Marshal or Deputy |
|--|-------------------------------------|

Costs shown on attached USMS Cost Sheet >>

REMARKS